

I. NEEL CHATTERJEE (State Bar No. 173985)
nchatterjee@goodwinlaw.com
GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, CA 94025-1105
Telephone: 650-752-3100
Facsimile: 650-853-1038

MONTE COOPER (State Bar No. 196746)
mcooper@orrick.com
ROBERT L. URIARTE (State Bar No. 258274)
ruriarte@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Rd.
Menlo Park, California 94025
Telephone: 650-614-7400
Facsimile: 650-614-7401

Attorneys for Plaintiff
FACEBOOK, INC.

[REDACTED VERSION OF
DOCUMENT(S) SOUGHT TO BE
SEALED]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FACEBOOK, INC.,

Plaintiff,

v.

POWER VENTURES, INC. a Cayman Island
corporation, STEVE VACHANI, an individual;
DOE 1, d/b/a POWER.COM, DOES 2-25,
inclusive,

Defendants.

Case No. 5:08-cv-05780-LHK

**SUPPLEMENTAL DECLARATION OF
MICHAEL R. CAPLAN IN SUPPORT OF
FACEBOOK'S RESPONSE TO ORDER
REGARDING BILLING RECORDS**

Dept: Courtroom 8, 4th Floor
Judge: Hon. Lucy H. Koh

1 I, Michael R. Caplan, declare as follows:

2 1. I am the Chief Operating Officer at the law firm of Goodwin Procter LLP, counsel
3 of record to Facebook, Inc. in the above-captioned matter. I manage the firm's business, financial
4 and administrative operations. I make this declaration based on my personal knowledge, unless
5 otherwise noted. If called, I can and will testify competently to the matters set forth herein.

6 2. This declaration accompanies Facebook's Response To Order Regarding Billing
7 Records pursuant to the Court's July 28, 2017 Order Regarding Billing Records. ECF No. 464.

8 3. Facebook filed a motion for attorney's fees on May 16, 2017 seeking fees in the
9 amount of \$146,667.84 for all proceedings after the Ninth Circuit's December 2016 remand
10 through April 2017. ECF No. 445. Specifically related to services billed by Goodwin Procter
11 LLP, the bill totaled \$23,745.04, reflecting the various billing rates of the attorneys and paralegal
12 involved from December 2016, through April 2017, including a 12% discount. We are now
13 seeking fees in the reduced amount of \$22,105.60 for Goodwin Procter LLP for a total of
14 \$145,028.40. We have further removed \$1,639.44 of attorneys' fees related to work performed in
15 response to Defendants' Supreme Court petition.

16 4. On July 27, 2017, the Court requested that Facebook provide "detailed billing
17 records indicating the hours spent by each biller on each task for which Plaintiff seeks
18 compensation" and "additional justification for their hourly rates." ECF No. 464 at 1.

19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

26 I declare under penalty of perjury that the foregoing is true and correct to the best of my
27 knowledge. Executed this 3rd day of August, 2017 in New York, New York.

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Dated: August 3, 2017

Respectfully submitted,

By: /s/ Michael R. Caplan
MICHAEL R. CAPLAN

ATTORNEY ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I, Neel Chatterjee, hereby attest that concurrence in the filing of this document has been obtained from any signatories indicated by a “conformed” signatures (/s/) within this document.

Dated: August 3, 2017

/s/ I. Neel Chatterjee
I. Neel Chatterjee